

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

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ELLIOTT BROIDY and BROIDY CAPITAL  
MANAGEMENT, LLC,

Plaintiffs,

- against -

GLOBAL RISK ADVISORS LLC,  
GRA MAVEN LLC,  
GRA QUANTUM LLC,  
GLOBAL RISK ADVISORS EMEA LIMITED,  
GRA RESEARCH LLC,  
QRYPT, INC.,  
KEVIN CHALKER,  
DENIS MANDICH,  
ANTONIO GARCIA, and  
COURTNEY CHALKER,

Defendants.  
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Case No. 19-cv-11861-MKV

**DECLARATION OF NANCY HART**

I, Nancy Hart, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a partner in the law firm Gibson, Dunn & Crutcher LLP (“Gibson Dunn”), and I am admitted to practice law in the State of New York and the Southern District of New York. I am one of the attorneys from Gibson Dunn representing the firm in Plaintiffs’ Motion for Sanctions (ECF 163). I make this declaration in response to Plaintiffs’ Motion.

2. Attached hereto as **Exhibit A** is a true and correct copy of the Huffington Post article titled “Leaked Emails Appear To Show A Top Trump Fundraiser Abusing His Power” and dated March 2, 2018 (ECF 139-5).

3. Attached hereto as **Exhibit B** is a true and correct copy of the Wall Street Journal article titled “Trump Ally Was In Talks to Earn Millions in Effort to End 1MDB Probe in U.S.” and dated March 1, 2018.

4. Attached hereto as **Exhibit C** is a true and correct copy of The New York Times article titled “How 2 Gulf Monarchies Sought to Influence the White House” and dated March 21, 2018.

5. Attached hereto as **Exhibit D** is a true and correct copy of The New York Times article titled “Fund-Raiser Held Out Access to Trump as a Prize for Prospective Clients” and dated March 25, 2018.

6. Attached hereto as **Exhibit E** is a true and correct copy of the Partial Unsealing Order issued in *In the Matter of the Search of Information Associated with Three Accounts Stored at Premises Controlled by Google, Inc. for Investigation of Violation of 18 U.S.C. § 1344*, No. 1:18-sc-00322-BAH, ECF 40 (D.D.C. Dec. 14, 2020).

7. Attached hereto as **Exhibit F** is a true and correct copy of the Partial Unsealing Order issued in *In the Matter of the Search of Information Associated With Three Accounts Stored at Premises Controlled by Google, Inc. for Investigation of Violation of 18 U.S.C. § 1344*, No. 1:18-sc-00322-BAH, ECF 44 (D.D.C. Dec. 15, 2022).

8. Attached hereto as **Exhibit G** is a true and correct copy of the Criminal Information filed in *United States v. Broidy*, No. 1:20-cr-00210-CKK, ECF 1 (D.D.C. Oct. 6, 2020).

9. Attached hereto as **Exhibit H** is a true and correct copy of the Statement of Offense filed in *United States v. Broidy*, No. 1:20-cr-00210-CKK, ECF 7 (D.D.C. Oct. 20, 2020).

10. Attached hereto as **Exhibit I** is a true and correct copy of the Plea Agreement filed in *United States v. Broidy*, No. 1:20-cr-00210-CKK, ECF 8 (D.D.C. Oct. 20, 2020).

11. Attached hereto as **Exhibit J** is a true and correct copy of the press release from the Department of Justice titled “Elliott Broidy Pleads Guilty for Back-Channel Lobbying Campaign to Drop 1MDB Investigation and Remove a Chinese Foreign National” and dated October 20, 2020.

12. Attached hereto as **Exhibit K** is a true and correct copy of the New York Times article titled “Two Trump Allies, Seeing Unlimited Opportunity, Instead Drew Scrutiny” and dated July 24, 2018.

13. Attached hereto as **Exhibit L** is a true and correct copy of the Gibson Dunn biography of my partner, Orin Snyder.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 6, 2023  
New York, New York.



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Nancy E. Hart